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FIRST GENERAL COUNSEL'S REPORT

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MUR: 6783
DATE COMPLAINT FILED: February 18, 2014
DATE OF NOTIFICATION: February 25, 2014
DATE ACTIVATED: July 8, 2014
DATE OF LAST RESPONSE: March 19, 2014

ELECTION CYCLE: 2014
EXPIRATION OF SOL: January 23, 2019 to
March 3, 2019

MUR: 6791
DATE COMPLAINT FILED: March 5, 2014
DATE OF NOTIFICATION: March 11, 2014
DATE ACTIVATED: July 8, 2014
DATE OF LAST RESPONSE: April 7, 2014

ELECTION CYCLE: 2014
EXPIRATION OF SOL: January 23, 2019 to
March 3, 2019

COMPLAINANT:

Scott Pierce

RESPONDENTS:

Manju for Congress, Inc. and Rajeev Goel in his
official capacity as treasurer (MUR 6783)
Manju Goel (MUR 6783)
Indian Americans for Freedom, NFPC
(MURs 6783 & 6791)
Shalabh Kumar (MUR 6783)

RELEVANT STATUTES
AND REGULATIONS:

52 U.S.C. § 30104(b), (g)(2)¹
52 U.S.C. § 30116(a)(1), (a)(7)(B)(iii), (f)
52 U.S.C. § 30118
52 U.S.C. § 30120(c)(2)
11 C.F.R. § 109.21
11 C.F.R. § 109.23

INTERNAL REPORTS CHECKED:

FEC Disclosure Reports

OTHER AGENCIES CHECKED:

Illinois State Board of Elections

¹ On September 1, 2014, the Federal Election Campaign Act of 1971, as amended (the "Act"), was transferred from Title 2 to new Title 52 of the United States Code.

I. INTRODUCTION

The Complaint in MUR 6783 alleges that Indian Americans for Freedom, NFPC ("IAFF"), a 501(c)(4) organization, and its founder, Shalabh Kumar, violated the Act by making in-kind contributions to the campaign of Congressional candidate Manju Goel in the form of coordinated mailings, free office space, and payments for staff salaries and other campaign expenses and that Goel and her principal campaign committee Manju for Congress ("MFC") accepted and failed to report them.² The Complaint in MUR 6791, filed by the *same* complainant, alleges that IAFF untimely filed a 48-Hour Notice of Independent Expenditures ("48-Hour Notice") and that six IAFF mailings contained disclaimers that failed to comply with the Act and the Commission's regulations.

IAFF and Kumar filed a joint response ("IAFF MUR 6783 Resp.") and Goel and MFC filed a joint response ("MFC Response") to the Complaint in MUR 6783, each denying that they violated the Act. IAFF responded to the Complaint in MUR 6791 ("IAFF MUR 6791 Resp.") by acknowledging that it untimely filed a 48-Hour Notice but denying that it violated the Commission's disclaimer regulations.

Based on the available record, we recommend that the Commission find reason to believe that IAFF made prohibited or excessive in-kind contributions in violation of 52 U.S.C. §§ 30116(a)(1)(A) or 30118(a) by republishing materials of the Goel campaign in four of its mailings and failed to include proper disclaimers in violation of 52 U.S.C. § 30120(c) and 11 C.F.R. 110.11(c) as to two mailings.³ We also recommend a limited investigation to determine the amount IAFF spent on the mailings at issue and to assess the adequacy of the disclaimers.

² Goel, a candidate in the 8th Congressional District in Illinois, lost the March 18, 2014, primary election with 28.5% of the vote.

³ Because it is unclear whether IAFF was an active corporation at the time some of the mailings were distributed, *see infra* at page 11, we recommend that the Commission find reason to believe that IAFF made an excessive or prohibited contribution.

1 The record does not, however, support the Complaint's allegation that IAFF or Kumar
2 coordinated with MFC on these communications, or made other in-kind contributions to MFC by
3 providing office space or other services to MFC. Therefore, we recommend that the Commission find
4 no reason to believe as to those allegations. Finally, we recommend that the Commission dismiss the
5 allegations that IAFF failed to timely report its independent expenditures.

6 **II. FACTS**

7 IAFF incorporated in the state of Illinois on October 2, 2012, as a non-profit social welfare
8 organization tax exempt under section 501(c)(4) of the Internal Revenue Code.⁴ IAFF reports its
9 independent expenditures to the Commission on Form 5 ("IE Reports"), which is used by persons
10 other than political committees.⁵ Shalabh Kumar founded IAFF and served as its chairman
11 and director until May 15, 2013, when he resigned.⁶ In his resignation letter to the Board of
12 Directors, posted on IAFF's website and attached to the Responses to the MUR 6783

⁴ See Letter to Commission from Alka Tyle accompanying a Form 5, Report of Independent Expenditures, 24-Hour Report ("24 Hour Notice") (Nov. 27, 2012). The Illinois Secretary of State's corporations database confirms that IAFF registered as a non-profit corporation on October 2, 2012, but it appears it was not in good standing at the time the Complaint in MUR 6783 was filed nor is it currently. IAFF also registered with the Internal Revenue Service as a Section 527 organization on September 10, 2012. Form 8871, Political Organization Notice of Section 527 Status, Indian Americans for Freedom (Sept. 10, 2012), available at the IRS website, Political Organizations database, <http://forms.irs.gov/app/pod/basicSearch/search?execution=e2s1>.

⁵ Approximately three weeks prior to incorporating, IAFF had registered with the Commission as an independent-expenditure-only political committee, but requested termination on November 28, 2012, having reported no activity. Letter and Statement of Organization filed by IAFF (Sept. 12, 2012), <http://docquery.fec.gov/pdf/152/12030883152/12030883152.pdf>; IAFF Termination Report (Nov. 28, 2012), <http://docquery.fec.gov/pdf/795/12030954795/12030954795.pdf>. IAFF filed a 24 Hour Notice on November 28, 2012, and explained in a cover letter that the IEOPC had terminated and the newly incorporated 501(c)(4) non-profit organization needed a new FEC committee identification number. See Letter to Commission from Alka Tyle (Nov. 27, 2012); see also Letter to IAFF from Reports Analysis Division, FEC, approving termination (Nov. 30, 2012), <http://docquery.fec.gov/pdf/438/12330017438/12330017438.pdf>. The Complaint in MUR 6783 alleges that IAFF is an IEOPC that is prohibited from making direct or in-kind contributions to federal candidates or committees. Compl. at 2 (Feb. 18, 2014). Because IAFF is a Form 5 filer and not an IEOPC, we do not specifically address that allegation in MUR 6783.

⁶ IAFF MUR 6783 Resp. at 1, Ex. A (Mar. 18, 2014); MFC Resp. at 1-2, Ex. B (Mar. 19, 2014).

1 Complaint, Kumar states that effective that day, "I will no longer be involved in the affairs of
2 [IAFF] due to my new responsibilities in various Republican/Conservative organizations in
3 Washington DC . . ."⁷ Kumar also stated in the letter that another individual, Brij L. Sharma,
4 had agreed to serve as IAFF's new Chair.

5 Following his stated withdrawal from IAFF, Kumar was actively involved in the
6 Congressional campaign of Manju Goel, a candidate in the 2014 primary election in Illinois' 8th
7 Congressional District. Kumar appeared with Goel and introduced her at a local Republican
8 party picnic where she announced her candidacy on September 8, 2013.⁸ According to the
9 Complaint in MUR 6783, Kumar managed the campaign's daily operations, including hiring and
10 firing staff, appeared with Goel at campaign events in the district and in Washington, D.C., and
11 handled press inquiries for the campaign.⁹ The IAFF Response does not dispute Kumar's
12 activities on behalf of the campaign, and it acknowledges his support for Goel.¹⁰ It emphasizes,
13 however, that he was acting in his capacity as a private citizen and was no longer associated with
14 IAFF.¹¹

15 IAFF also supported Goel's election by making approximately \$267,146 in independent
16 expenditures in support of Goel, all reported by IAFF as financed by Vikram Aditya Kumar,

⁷ *Id.* Kumar reportedly represented that his new responsibilities included chairing a project to field 10 Indian-American GOP Congressional candidates. Stephen Zalusky, *Goel Announces 8th Congressional Candidacy*, DAILY HERALD (Sept. 9, 2013), <http://www.dailyherald.com/article/20130909/news/709099904>.

⁸ There, Kumar also discussed an initiative to recruit Indian American candidates to run for Congress. See video entitled "09-08-2013 Manju for Congress (Video Clip #1)" posted on YouTube by Asian Media USA on Sept. 11, 2013, http://www.youtube.com/watch?v=obhSzCswl0U&feature=player_detailpage.

⁹ MUR 6783 Compl. at 4.

¹⁰ IAFF MUR 6783 Resp. at 2.

¹¹ *Id.*

1 described in the MUR 6791 Complaint as Shalabh Kumar's son.¹² Among IAFF's independent
2 expenditures were \$172,501 for mailings and "flyers" distributed between January 23, 2014, and
3 March 3, 2014. IAFF disseminated at least six mailings expressly advocating the election of
4 Goel or the defeat of her opponent, Larry Kafeish, in the primary election. The specific content
5 of four of IAFF's mailings are discussed in detail below as they relate to the allegations in the
6 Complaint.

7 The Complaint in MUR 6783 notes several similarities between the communications
8 disseminated by IAFF and MFC. First, it attaches copies of two IAFF mailings and an MFC
9 mailing that had been mailed in the Congressional District as of February 15, 2014, and alleges
10 that the similarities in the messaging, the use of the same candidate photos and typesetting, and
11 the fact that all were mailed using the same bulk mail permit number "demonstrate coordination
12 between IAFF and MFC."¹³ In response, MFC states that it is unaware of any provision of the
13 Act, and the Complaint fails to cite to any, that prohibits committees from disseminating similar
14 campaign materials.¹⁴ IAFF does not address the mailings in its MUR 6783 response.

15 According to IAFF's IE Report of February 12, 2014, it made two payments totaling
16 \$40,501 to One Step Printing ("One Step") for the first of its mailings distributed on January 23
17 and February 5, 2014, a vendor also used by MFC throughout the campaign.¹⁵ And in fact, some
18 of IAFF's mailings were distributed using the same bulk mail permit number that appears on

¹² MUR 6791 Compl. at 1; IAFF IE Report, Amended April Quarterly Report (Apr. 18, 2014) (listing Vikram Kumar as the sole contributor to IAFF).

¹³ MUR 6783 Compl. at 5, Ex. L.

¹⁴ MFC Resp. at 2.

¹⁵ MUR 6791 Compl. at Ex. D (showing two payments to One Step totaling \$40,501 for printing and mailings supporting Goel and distributed on the referenced dates); *see* MFC 2013 Year End, 2014 Pre-Primary and 2014 April Quarterly Reports, all disclosing debt and payments to One Step, totaling \$44,336 throughout the campaign for printing, postage, direct mail and t-shirts.

1 MFC's mailings. Further, the campaign's Post Office Box was (apparently mistakenly) used as
2 the return address on one of IAFF's mailings.¹⁶

3 The Complaint also asserts that MFC's campaign is headquartered out of Kumar and
4 IAFF's offices. Respondents acknowledge that MFC rented office space from one of Kumar's
5 companies.¹⁷

6 III. ANALYSIS

7 The Complaint in MUR 6783 alleges that IAFF and Kumar improperly made a number of
8 in-kind contributions to MFC because they are "for all practical purposes, running and financing
9 [Goel's] campaign," including engaging in "an active mail campaign on behalf of the candidate"
10 and in coordination with the candidate, and paying for the campaign's office space and other
11 services.¹⁸ Further, the Complaint in MUR 6791 alleges that IAFF failed to timely disclose
12 independent expenditures and failed to include disclaimers in its communications that comply
13 with the Commission's disclaimer regulations.¹⁹

¹⁶ See MUR 6783 Compl. at Ex. L and description, *infra*, of IAFF's mailing *Best Reagan Conservative (Republican Leaders Endorsement)*.

¹⁷ MFC Resp. at 2, Ex. C; IAFF MUR 6783 Resp. at 1, Ex. B. IAFF appears to be located in the same office complex as MFC. IAFF lists its address in its initial 48-Hour Notice and in one of its first mailings as 363 St. Paul Blvd. in Carol Stream, Illinois, although in its later IE Reports and in another mailing it uses the address 341 St. Paul Blvd. 341, 343 and 363 St. Paul Blvd. all appear to belong to the same office complex, and the latter is the address of a group of companies owned by Kumar collectively known as the AVG group of companies. The Illinois Secretary of State record for Autotech Technologies, LP, the Kumar company from whom MFC rents space (see IAFF MUR 6783 Resp. at 2, Ex. B), lists its address as 343 St. Paul Blvd.; see also <http://www.autotechcontrols.net/aboutus.php> (stating that AVG is an "American Group" of companies that design and manufacture state of the art electronic products and listing the address of one of the companies, Autotech Controls, as 363 St. Paul Blvd., Carol Stream, Ill.).

¹⁸ MUR 6783 Compl. at 1-2, 4.

¹⁹ MUR 6791 Compl. at 1-2.

A. There is Reason to Believe that IAFF Made an In-Kind Contribution to MFC by Republishing Goel's Campaign Materials (MUR 6783)

Under the Act, "the financing by any person of the dissemination, distribution, or republication, in whole or in part, of any broadcast or any written, graphic, or other form of campaign materials prepared by the candidate, his campaign committees, or authorized agents shall be considered an expenditure."²⁰ The republication of campaign materials prepared by a candidate's authorized committee is considered a contribution for purposes of contribution limitations and reporting responsibilities of the person making the expenditure.²¹ In a 2003 rulemaking involving the republication provision, the Commission explained that the person financing the republication essentially "has provided something of value to the candidate [or] authorized committee."²² The Commission further explained in a 2006 rulemaking that "Congress has addressed republication of campaign material through 2 U.S.C. § 441a(a)(7)(B)(iii) [(recodified at 52 U.S.C. § 30116(a)(7)(B)(iii))] in a context where the candidate/author generally views republication of his or her campaign material, even in part, as a benefit" and "can be reasonably construed only as for the purpose of influencing an election."²³

An examination of IAFF's mailings and MFC's campaign materials reveals that four of IAFF's mailings contain much of the same content, typesetting, formatting and photographs as in an MFC mailing, MFC's website, or on a website created by MFC that attacks her opponent and

²⁰ 52 U.S.C. § 30116(a)(7)(B)(iii) (formerly 2 U.S.C. § 441a(a)(7)(B)(iii)).

²¹ 11 C.F.R. § 109.23.

²² Explanation and Justification, *Coordinated and Independent Expenditures*, 68 Fed. Reg. 421, 442 (Jan. 3, 2003).

²³ 68 Fed. Reg. at 443; Explanation and Justification, *Coordinated Communications*, 71 Fed. Reg. 33,190, 33,191 (June 8, 2006).

1 is linked to on the MFC website.²⁴ Each of these four IAFF mailings is a single page, two-sided
2 piece as is the MFC mailing. We address each of the four mailings in turn and have included as
3 an attachment copies of them showing the parts that replicate MFC's campaign material.
4 Attachment 1 at 1-8. A copy of the MFC mailing is also included for convenience. *Id.* at 9-10.

5 First, on IAFF's *Where's Larry* mailer, the front contains a photo of a Virginia license
6 plate purporting to be Larry Kafeish's Virginia license plate.²⁵ This photograph appears on a
7 website (WhereisLarryWhoisLarry.com) that was created by MFC and linked to MFC's website.
8 The front also contains the same bulk mail permit as on MFC's mailing.²⁶ The back of *Where's*
9 *Larry* contains a large photo of Goel holding a phone — a cropped version of this photo is
10 featured prominently on the home page of the MFC website.²⁷ Further, the following text
11 comprising approximately half of the back of *Where's Larry* is identical to the front of the MFC
12 mailer, including font style and capitalization:²⁸

13 Republican Manju Goel.
14 Best Conservative Candidate to Retire Tammy Duckworth from Congress
15 Manju Goel will ...
16 • Champion Freedom and Limited Government
17 • Champion Personal Responsibility
18 • Champion Common-sense Household
19 Fiscal Discipline in Washington, DC
20 • Grow our Party, Bring 20K+ new voters

²⁴ MFC's website became inaccessible in late May 2014. Screen captures of the website can be found at http://web.archive.org/web/*/manjuforcongress.com. We have also included relevant screenshots in the Voting Ballot Matters Folder.

²⁵ *Id.* at 1.

²⁶ *Id.* at 1 and 9.

²⁷ *Id.* at 2.

²⁸ *Id.* at 2 and 9.

1 Second, the front of the *Best Reagan Conservative (Gingrich Endorsement)* mailer
2 contains two photos of Goel that appear on MFC's website: the phone photo of Goel that
3 appears to be a flipped version of the photo featured prominently on the MFC website, and a
4 photo of Goel with three supporters.²⁹ The front side also contains a headshot photo of Newt
5 Gingrich that is identical to one that appears on MFC's website featuring Gingrich's
6 endorsement.³⁰ And again, the mailer contains the same bulk mail permit as on MFC's
7 mailing.³¹ The back of *Best Reagan Conservative (Gingrich Endorsement)* features three photos
8 of Goel, all of which appear on the MFC website.³² It also features the text of an endorsement
9 by Gingrich with the same edits as an edited version of Gingrich's endorsement appearing on
10 another part of MFC's website.³³ Finally, the back of the mailer contains the same slogan and
11 capitalization that appears on MFC mailer: "Manju [] will Grow our Party, Bring 20K+ new
12 voters."³⁴

13 Third, the front and back of the third mailing, *Virginia Resident Larry Kaifesh*, contains a
14 reproduced excerpt of a process server affidavit in a lawsuit in which the process server states
15 that the apartment where service was attempted reportedly had been vacant for one and a half

²⁹ *Id.* at 3. The unedited Gingrich endorsement appears on a "News" section of the MFC website.

³⁰ *Id.*

³¹ *Id.* at 3 and 9.

³² *Id.* at 4.

³³ *Id.*

³⁴ *Id.* at 4 and 9.

1 months.³⁵ A PDF of the full affidavit is linked to on the MFC-created website,
2 WhereisLarryWhoisLarry.com, a prominent link to which is featured on MFC's website.

3 Finally, the front of the fourth mailing, *Best Reagan Conservative (Republican Leaders*
4 *Endorsements)* is identical to the front of *Best Reagan Conservative (Gingrich Endorsement)*
5 except that it lists MFC's P.O. Box as IAFF's address.³⁶ The back of the fourth mailing contains
6 the same large, cropped phone photo of Goel featured on the MFC website and the same slogan
7 and capitalization that appears on MFC's mailing: "Manju [] will Grow our Party, Bring 20K+
8 new voters."³⁷ In addition, it contains the same formatted endorsements and head shot photos of
9 Gingrich and former Congressman Joe Walsh that appear on the MFC website; a formatted
10 version with photo of an endorsement by Aaron Schock that appears on MFC's website as a
11 handwritten note on a PDF of a two-page endorsement letter from Pete Sessions; excerpts from
12 the Sessions endorsement letter; and an endorsement by former Reagan campaign official Don
13 Totten appearing in a news release on the MFC website.³⁸

14 The republication provisions of the Act and Commission regulations recognize the value
15 to a candidate of a third party further disseminating material belonging to or derived from a
16 candidate's campaign. The comparison of IAFF and MFC's materials shows that IAFF included
17 Goel's campaign materials in its own mailers. By including MFC campaign materials in
18 mailings expressly advocating Goel's election and the defeat of her opponent, IAFF made in-

³⁵ *Id.* at 5-6. The lawsuit in question was a defamation lawsuit filed by Kumar against Kaifesh in November 2013, a copy of which is attached to the MUR 6783 Complaint. MUR 6783 Compl. at Ex. K.

³⁶ Attachment 1 at 7.

³⁷ *Id.* at 8-9

³⁸ *Id.* at 8.

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1 kind contributions to MFC under the republication provisions of the Act and Commission's
2 regulations.

3 As noted, IAFF incorporated on October 2, 2012. The Illinois Secretary of State record
4 attached to the Complaint in MUR 6783, however, shows that IAFF was not in good standing
5 around the time the Complaint was filed in mid-February 2014 and it is not currently in good
6 standing.³⁹ IAFF's IE Reports disclose that it distributed mailings and flyers between January 23
7 and March 3, 2014, and that its funding came solely from Vikram Kumar. Because IAFF may
8 not have been an active corporation at the time it financed and distributed at least some of its
9 mailings, and given that IAFF reported its funding as originating from one individual, we
10 recommend that the Commission find reason to believe that Indian Americans for Freedom
11 violated 52 U.S.C. §§ 30116(a)(1)(A) and 30118(a) (formerly 2 U.S.C. §§ 441a(a)(1)(A) and
12 441b(a)) by making excessive or prohibited in-kind contributions to Manju for Congress.

13 **B. There is No Reason to Believe that MFC Accepted an In-Kind Contribution**
14 **from IAFF in Connection with IAFF's Mailings (MUR 6783)**
15

16 A political committee may not knowingly accept contributions made in violation of the
17 Act's contribution limitations or its prohibition against corporate contributions.⁴⁰ It appears that
18 IAFF made prohibited or excessive in-kind contributions to MFC by republishing MFC's
19 campaign material. MFC is not deemed to have accepted or received in-kind contributions, and
20 is not required to report them, unless IAFF's mailings constitute coordinated communications.⁴¹

³⁹ MUR 6783 Compl. at Ex. A.

⁴⁰ 52 U.S.C. §§ 30116(f) and 30118(a) (formerly 2 U.S.C. §§ 441a(f) and 441b(a)).

⁴¹ 11 C.F.R. § 109.23(a). *See also* 52 U.S.C. § 30116(a)(7)(B)(i) (formerly 2 U.S.C. § 441a(a)(7)(B)(i)) providing that an expenditure made by any person "in cooperation, consultation, or concert, with, or at the request or suggestion of, a candidate, his authorized political committees or their agents" constitutes an (in-kind) contribution.

1 A communication is coordinated with a candidate, a candidate's authorized committee, or agent of
2 the candidate or committee, when the communication: (1) is paid for by a person other than that candidate
3 or authorized committee (the "payment prong"); (2) satisfies at least one of the content standards set forth
4 in 11 C.F.R. § 109.21(c) (the "content prong"); and (3) satisfies at least one of the conduct standards set
5 forth in 11 C.F.R. § 109.21(d) (the "conduct prong").⁴²

6 Here, the payment prong is satisfied because IAFF, a third party, paid for the mailings. The content
7 prong is satisfied because the four mailings constitute republished MFC campaign material and each
8 expressly advocates Goel's election or the defeat of her opponent, Larry Kaifesh.⁴³

9 Under the conduct prong of the Commission's coordinated communications regulation, if a third
10 party republishes campaign materials, the candidate or his authorized committee will be deemed to have
11 engaged in coordination with that person only if: (1) the communication was created, produced, or
12 distributed at the request or suggestion of a candidate or authorized committee, or at the suggestion of the
13 person paying for it and the candidate or authorized committee assents ("request or suggestion" standard);
14 (2) the candidate or authorized committee was materially involved in specific details of the communication,
15 including its content, timing, and intended audience ("material involvement" standard); or (3) the

⁴² 11 C.F.R. § 109.21(a).

⁴³ See 11 C.F.R. §§ 109.21(c)(2) (republication) and (3) (express advocacy). *Where's Larry* exhorts recipients to "Send Manju Goel to Congress from IL District 8;" *Best Reagan Conservative (Gingrich Endorsement)* and *Best Reagan Conservative (Republican Leaders Endorsement)* state "Republican Manju Goel, Best Reagan Conservative for IL 8 to Retire Tammy Duckworth from Congress" and urge recipients to "Vote March 18;" *Virginia Resident Larry Kaifesh* asks why "Virginia Resident Larry Kaifesh [would] Run for Congress in Illinois" and urges recipients to "Vote No on Larry Kaifesh." See 11 C.F.R. § 100.22. Each of mailings also satisfies the content standard at 11 C.F.R. § 109.21(c)(4) (public communications distributed within 90 days of an election).

Each of the above-referenced content standards apply to "public communications" which include "mass mailings" defined as mailings of more than 500 pieces of mail of an identical or similar nature within any 90 day period. 11 C.F.R. §§ 100.26 and 100.27. IAFF's mailings likely constitute public communications as the Complaint in MUR 6783 alleges the attached mailings were sent district-wide and IAFF's disclosed costs for the first two mailings total \$40,501. MUR 6783 Compl. at 4; MUR 6791 Compl. at Ex. D.

1 communication was created after one or more substantial discussions between the person paying
2 for the communication and the candidate or his authorized committee or the candidate's
3 opponent or his authorized committee ("substantial discussion" standard).⁴⁴ Similarly, a
4 candidate or committee is not deemed to have received or accepted an in-kind contribution that
5 results from conduct satisfying the common vendor conduct standard unless the candidate or his
6 or her committee engages in conduct satisfying the request or suggestion, material involvement
7 or substantial discussion standards.⁴⁵

8 In addition to alleging that the similarities between IAFF's mailings and MFC's mailing
9 demonstrate coordination, the Complaint in MUR 6783 relies on associations and links between
10 IAFF and MFC in broadly asserting that IAFF and MFC coordinated their activities. Most
11 notably, the Complaint alleges that Kumar operated and managed IAFF at the same time he was
12 significantly involved in Goel's campaign.⁴⁶ It also asserts that the departure of Alka Tyle as a
13 "principal staffer" from the Goel campaign to IAFF as announced by Tyle in an attached
14 January 6, 2014, e-mail demonstrates "staff coordination" between them.⁴⁷ The Complaint also

⁴⁴ 11 C.F.R. § 109.21(d)(6) (citing 109.21(d)(1)-(3)). The material involvement and substantial discussion standards of the conduct prong are not satisfied "if the information material to the creation, production, or distribution of the communication was obtained from a publicly available source." 11 C.F.R. § 109.21(d)(2) and (3). *See also* Explanation and Justification, *Coordinated Communications*, 71 Fed. Reg. 33,190, 33,205 (June 8, 2006) (explaining that "[u]nder the new safe harbor, a communication created with information found . . . on a candidate's or political party's Web site, or learned from a public campaign speech . . . is not a coordinated communication"). However, to qualify for the safe harbor for the use of publicly available information, the person or organization paying for the communication "bears the burden of showing that the information used in creating, producing or distributing the communication was obtained from a publicly available source." *Id.*

⁴⁵ 11 C.F.R. § 109.21(b)(2).

⁴⁶ MUR 6783 Compl. at 1, 3-4.

⁴⁷ *Id.* at 2, Ex. E.

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1 alleges that MFC's campaign operated out of the same offices as IAFF and Kumar's
2 companies.⁴⁸

3 The Complaint's broad coordination allegation is intertwined with more specific
4 allegations concerning possible Kumar or IAFF in-kind contributions to MFC. Nevertheless,
5 Respondents deny the broad coordination allegation by refuting that Kumar was simultaneously
6 involved in IAFF and Goel's campaign, pointing to his May 15, 2013, resignation letter to the
7 IAFF Board of Directors.⁴⁹ Next, they maintain that Tyle was not a paid MFC staffer but served
8 as a volunteer for MFC in the early stages of the campaign.⁵⁰ IAFF asserts Tyle took time off
9 before she joined IAFF and states that her use of the MFC e-mail account to announce her
10 departure was a "mistake," implying she had left MFC sometime before January 2014.⁵¹ For its
11 part, MFC claims to have no relationship with IAFF and does not know where IAFF operates.⁵²

12 The Complaint sets out an array of circumstantial facts that suggest opportunities for
13 coordination between IAFF and MFC. But without more, the available facts do not satisfy, or
14 raise a sufficient inference, that the request or suggestion, substantial discussion or material
15 involvement conduct standards have been met.

16 Both IAFF and MFC state that Kumar was not involved in IAFF's operations following
17 his May 15, 2013, resignation letter, seven months before IAFF began its independent
18 expenditure campaign. Other than Kumar's former stewardship of IAFF, the Complaint provides

⁴⁸ *Id.* at 1-2, Ex. C.

⁴⁹ IAFF MUR 6783 Resp. at 1, Ex. A; MFC Resp. at 1-2, Ex. B.

⁵⁰ IAFF MUR 6783 Resp. at 1-2; MFC Resp. at 3.

⁵¹ IAFF MUR 6783 Resp. at 2.

⁵² MFC Resp. at 2.

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1 no information that Kumar continued his involvement in IAFF and we are aware of none.
2 Further, in Kumar's resignation letter, he states that someone else assumed the chairmanship of
3 IAFF. As for Alka Tyle, it appears from IAFF's IE Reports covering activity in the prior
4 election cycle that she worked for IAFF as late as January 2013 before volunteering for the
5 campaign and then returning to IAFF as of January 6, 2014.⁵³ Other than Tyle's movement
6 between the entities, the Complaint does not provide information, and we are aware of none, that
7 suggests she served as a conduit of information such that any conduct standard at 11 C.F.R.
8 § 109.21(d)(1), (2) or (3) is satisfied. Similarly, the fact that IAFF apparently operated from or
9 at least maintained a mailing address at, the same office complex in which MFC rented space
10 suggests there could have been opportunities for IAFF and MFC to interact. Again though, the
11 record does not set forth any facts to suggest that Tyle or anyone else associated with IAFF
12 engaged in conduct with MFC or Goel that satisfied the request or suggestion, material
13 involvement or substantial discussion conduct standards.

14 Finally, as noted *supra*, it appears that IAFF and MFC used a common vendor, One Step,
15 to produce mailings. As noted, IAFF used One Step for its initial independent expenditures,
16 reporting payments to it for printing and mailings distributed on January 23 and February 5,
17 2014.⁵⁴ MFC reported a payment to One Step for printing and postage on January 11, 2014,
18 although it began carrying a debt to One Step beginning in the 2013 Year End Report and used
19 the vendor throughout the campaign.⁵⁵ Assuming these payments were for the production of

⁵³ See MUR 6783 Compl. at Ex. B.

⁵⁴ For its subsequent independent expenditure flyers distributed later in February and March 2014, IAFF used a consultant named Brad Goodman. See IAFF IE Amended April Quarterly Report (Apr. 18, 2014).

⁵⁵ MFC made earlier payments to One Step for printing on November 6 and December 15, 2013, and for campaign t-shirts on December 15, 2013.

1 some or all of the IAFF and MFC mailings at issue and the common vendor conduct standard at
2 11 C.F.R. § 109.21(d)(4) is met,⁵⁶ though, Commission regulations still require that one of the
3 Section 109.21(d)(1) through (3) conduct standards must be satisfied to conclude that Goel or
4 MFC accepted an in-kind coordinated contribution. It is possible that One Step could have
5 served as a conduit through which Goel or MFC requested or suggested that IAFF produce the
6 mailings, or through which IAFF and MFC engaged in substantial discussions about the content
7 of the mailers or through which Goel or MFC was materially involved in decisions about the
8 production or distribution of the mailings. Again, however, there is no information from which
9 to infer that is the case.

10 Accordingly, we recommend that the Commission find no reason to believe that Manju
11 for Congress or Manju Goel accepted a prohibited or excessive in-kind contribution in the form
12 of coordinated mailings in violation of 52 U.S.C. §§ 30116(f) and 30118(a) (formerly 2 U.S.C.
13 §§ 441a(f) and 441b(a)) or that MFC failed to report them in violation of 52 U.S.C. § 30104(b)
14 (formerly 2 U.S.C. § 434(b)).

15 **C. There is No Reason to Believe that IAFF Made In-Kind Contributions to**
16 **MFC By Paying for Office Space and Other Services (MUR 6783)**
17

18 The Complaint alleges that IAFF or Kumar (directly or through his companies) made,
19 and MFC accepted and failed to report, a number of excessive or prohibited in-kind
20 contributions.⁵⁷ We address each specific allegation in turn.

21 First, the MUR 6783 Complaint alleges, based on attached documentation, that MFC
22 operates out of the same offices as IAFF and companies owned and operated by Kumar, yet

⁵⁶ See 11 C.F.R. § 109.21(d)(4).

⁵⁷ MUR 6783 Compl. at 2-4.

1 failed to disclose the receipt of any in-kind contribution for office space from any of them. The
2 available information, however, indicates that MFC paid at least \$1,050 per month in rent to
3 Kumar's company, Autotech Technologies, LP, from October 2013 through March 2014, and
4 disclosed that amount on its disclosure reports.⁵⁸ Moreover, Respondents produced a letter dated
5 September 15, 2013, from a certified public accountant determining \$1,050 per month to be the
6 fair market value, and we have no information to the contrary.⁵⁹ Accordingly, it does not appear
7 that IAFF or Kumar, directly or through any of his companies, made or that MFC accepted and
8 failed to report in-kind contributions in the form of office space.

9 Second, the Complaint alleges that Kumar or IAFF paid the salaries or other
10 compensation for six MFC campaign staffers and a contractor during the third quarter of 2013.⁶⁰
11 The Complaint apparently bases the allegation on MFC's October Quarterly Report, which
12 discloses the receipt of over \$200,000 in contributions but disbursements of only \$55 while
13 staffers and a contractor were allegedly working for the campaign. MFC responds that it had no
14 paid staff during the third quarter of 2013 because the campaign was "miniscule" during that
15 time, and asserts that it brought on staff and a consultant during the fourth quarter of 2013.⁶¹
16 Goel filed her Statement of Candidacy on September 18, 2013, and MFC filed its Statement of
17 Organization on the same day, twelve days before the end of the reporting period. MFC's 2013
18 October Quarterly Report shows that it raised virtually all of its funds in the last six days of the

⁵⁸ See IAFF MUR 6783 Resp. at Ex. B; MFC Resp. at Ex. C (MFC check payable to Autotech in the amount of \$3,150 dated December 28, 2013, with memo line "Oct-Dec 2013 Rent-Internet for Office"); MFC Resp. at Ex. D (2013 Year End Report at 12, disclosing the \$3,150 payment); 2014 April Quarterly Report at 8 (\$5,100 payment to Autotech for "rent").

⁵⁹ See IAFF MUR 6783 Resp. at Ex. B.

⁶⁰ MUR 6783 Compl. at 2.

⁶¹ MFC Resp. at 2-3, Exs. D, E (2013 Year End and 2014 Pre-Primary Reports disclosing payments to staff and consultant), Exs. F-J (copies of checks).

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1 quarter, including \$25,000 from the candidate. Complainant provides no information about any
2 campaign activity or events during the third quarter other than the campaign kick-off at the
3 September 8, 2013, local Republican party picnic, known as the Northwest Suburban Republican
4 Family Picnic ("NW Picnic"), and we are aware of none. These facts tend to support MFC's
5 assertion that the campaign was a minimal operation at this point with little need for paid
6 assistance. Under these circumstances, it does not appear that Kumar or IAFF made and MFC
7 accepted and failed to report in-kind contributions in the form payments for staff salaries or
8 vendor services during the 2013 October Quarterly reporting period.

9 Third, the Complaint alleges that Kumar personally paid to bus Goel supporters to the
10 NW Picnic.⁶² The allegation appears to rest only on Kumar's involvement with the event.
11 Neither Response addresses the allegation. A state committee bearing the same name as the NW
12 Picnic, formed to operate the picnic, is registered with the Illinois State Board of Elections and
13 disclosed a \$390 payment on September 8, 2013, for a shuttle bus for the event.⁶³ Accordingly,
14 it appears there was no in-kind contribution to MFC here.

15 Finally, the Complaint alleges that MFC failed to disclose the value of legal services
16 provided by Kumar's personal attorney to represent Goel in a State Board of Elections hearing
17 challenging her nominating petitions.⁶⁴ MFC acknowledges that Kumar's personal counsel
18 provided legal services in connection with the matter, but asserts that the fee arrangements for
19 the attorney's services are "outside the jurisdiction of the [Act]."⁶⁵ The Commission has

⁶² MUR 6783 Compl. at 3.

⁶³ See Illinois State Board of Elections website,
<http://www.elections.il.gov/CampaignDisclosure/CommitteeDetail.aspx?id=25515>.

⁶⁴ MUR 6783 Compl at 4.

⁶⁵ MFC Resp. at 2.

1 determined that funds raised or spent by an entity other than a political committee to defray legal
2 fees incurred by a candidate in defending a nominating petition challenge are not contributions or
3 expenditures under the Act. Advisory Op. 1996-39 (Heintz for Congress). It follows then, that
4 the provision of any in-kind legal services to represent Goel in the petition challenge is not an in-
5 kind contribution to MFC.

6 In view of the above, we recommend that the Commission find no reason to believe that
7 IAFF or Kumar violated 52 U.S.C. §§ 30118(a) or 30116(a)(1)(A) (formerly 2 U.S.C. §§ 441b(a)
8 and 441a(a)(1)(A)) by making prohibited or excessive in-kind contributions to MFC or that MFC
9 violated 52 U.S.C. §§ 30118(a), 30116(f) or 30104(b) (formerly 2 U.S.C. §§ 441b(a), 441a(f)
10 and 434(b)) by accepting and failing to disclose the receipt of office space, payments of staff and
11 contractor salaries, bus travel, or legal services.

12 **D. The Commission Should Dismiss With Caution the Allegation that IAFF**
13 **Failed to Timely Disclose Independent Expenditures (MUR 6791)**
14

15 The Complaint alleges that IAFF untimely filed a 48-Hour Notice disclosing \$40,501 that it
16 spent to print and mail communications supporting Goel that were distributed on January 23,
17 2014 (\$9,891.00) and February 5, 2014 (\$30,610.00).⁶⁶ See 52 U.S.C. § 30104(g)(2) (formerly
18 2 U.S.C. § 434(g)(2)). The Notice also discloses a \$100,000 contribution from Vikram Kumar
19 that financed the mailings. IAFF admits that it filed the Notice three business days late because
20 it mailed the Notice to the Commission rather than electronically filing it. It emphasizes that it
21 filed timely each of its other IE Reports.⁶⁷ Because the Notice was filed only three days late and

⁶⁶ MUR 6791 Compl. at 1, Ex. D.

⁶⁷ IAFF MUR 6791 Resp. at 1-2. We note that IAFF failed to include these expenditures in its 2014 April Quarterly Report and still has not filed the Notice electronically despite a letter from RAD advising IAFF that it must do so to satisfy its reporting obligation under 11 C.F.R. § 104.18 or be deemed a non-filer. Letter to IAFF from Kristin Roser, Chief, Reports Analysis Division Compliance Branch (May 14, 2014).

1 filed well before the March 18, 2014, primary election, we recommend that the Commission
2 dismiss the allegation but caution IAFF.⁶⁸

3 **E. There is Reason to Believe that IAFF Failed to Comply with Disclaimer**
4 **Requirements as to Some of Its Mailings (MUR 6791)**
5

6 The Complaint alleges that six IAFF mailings contain inadequate disclaimers because
7 they fail to satisfy the provisions of the Commission regulations requiring that disclaimers be set
8 apart from the rest of the communication in a printed box, have a reasonable degree of color
9 contrast between the background and printed statement, and be of a sufficient size to be clearly
10 readable.⁶⁹ IAFF asserts that the disclaimers on the mailings satisfy the regulations.⁷⁰ The
11 disclaimers on four of the mailings appear to substantially comply with the disclaimer provisions
12 in that they are of sufficient size to be clearly readable, are set apart from the rest of the
13 communication, albeit not in a printed box, and the printed statements are in a contrasting color
14 from the background.⁷¹ By contrast, the disclaimers on the other two mailings, advocating
15 Kafeish's defeat, appear to be barely readable.⁷² The copies of these mailings are poor quality
16 photographs, however, which make readability difficult to definitively assess. We recommend,
17 therefore, that the Commission find reason to believe that IAFF violated 52 U.S.C. § 30120(c)
18 (formerly 2 U.S.C. § 441d(c)) and 11 C.F.R. § 110.11(c)) with respect to the two mailings so that
19 we can assess whether they substantially comply with the Act's disclaimer requirements.

⁶⁸ See MUR 5790 (Bob Corker for Senate) (Commission dismissed matter with admonition to Committee for filing one day late 48-Hour Notices for contributions totaling \$33,700).

⁶⁹ MUR 6791 Compl. at 2, Ex. C. See 52 U.S.C. § 30120(c) (formerly 2 U.S.C. § 441d(c)) and 11 C.F.R. § 110.11(c).

⁷⁰ IAFF MUR 6791 Resp. at 2.

⁷¹ See MUR 6791 Compl. Ex. C (*Where's Larry, Best Reagan Conservative (Gingrich Endorsement), Larry Kaifesh's Immigration Plan, and Best Reagan Conservative (Republican Leaders Endorsement)*).

⁷² See *id.* (*Virginia Resident Larry Kaifesh and Why Would Virginia Resident Larry Kaifesh Run for Congress in Illinois*).

IV. INVESTIGATION

IAFF reported \$172,501 in independent expenditure mailings and flyers. We propose a limited investigation to determine the cost of the IAFF mailings that constitute republished campaign materials and to obtain copies of the IAFF mailings that appear to have inadequate disclaimers to assess whether they substantially comply with the disclaimer provisions. We will seek to conduct the investigation through voluntary means, but recommend that the Commission authorize the use of compulsory process as necessary.

V. RECOMMENDATIONS

MUR 6783

1. Find reason to believe that Indian Americans for Freedom, NFPC, violated 52 U.S.C. §§ 30116(a)(1)(A) or 30118(a) (formerly 2 U.S.C. §§ 441a(a)(1)(A) and 441b(a)) by making excessive or prohibited in-kind contributions to Manju for Congress, Inc. as a result of republishing campaign materials.
2. Find no reason to believe that Manju for Congress, Inc., and Rajeev Goel in his official capacity as treasurer or Manju Goel violated 52 U.S.C. §§ 30116(f) or 30118(a) (formerly 2 U.S.C. §§ 441a(f) and 441b(a)) by knowingly accepting excessive or prohibited in-kind contributions in the form of coordinated mailings.
3. Find no reason to believe that Manju Goel for Congress, Inc., and Rajeev Goel in his official capacity as treasurer violated 52 U.S.C. § 30104(b) (formerly 2 U.S.C. § 434(b)) by failing to report in-kind contributions in the form of coordinated mailings.
4. Find no reason to believe that Indian Americans for Freedom, NFPC, or Shalabh Kumar violated 52 U.S.C. §§ 30116(a)(1)(A) or 30118(a) (formerly 2 U.S.C. §§ 441a(a)(1)(A) and 441b(a)) by making excessive or prohibited in-kind contributions to Manju for Congress, Inc., in the form of office space and payments of staff and contractor salaries, bus travel, or legal services.
5. Find no reason to believe that Manju for Congress, Inc., and Rajeev Goel in his official capacity as treasurer violated 52 U.S.C. §§ 30116(f), 30118(a) or § 30104(b) (formerly 2 U.S.C. §§ 441a(f), 441b(a), and 434(b)) by accepting and failing to report excessive or prohibited in-kind contributions in the form of office space and payments of staff salaries and contractor salaries, bus travel, or legal services.

6. Approve the attached Factual and Legal Analyses.
7. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
8. Approve the appropriate letters.


MUR 6791

1. Dismiss with caution the allegation that Indian Americans for Freedom, NFPC, violated 52 U.S.C. § 30104(g)(2) (formerly 2 U.S.C. § 434(g)(2)).
2. Find reason to believe that Indian Americans for Freedom, NFPC, violated 52 U.S.C. § 30120(c) (formerly 2 U.S.C. § 441d(c)) and 11 C.F.R. § 110.11(c) by failing to include adequate disclaimers on some of its mailings.

11-5-14

Date

BY:



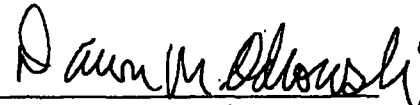
Kathleen Guith

Deputy Associate General Counsel
for Enforcement



Mark Allen

Acting Assistant General Counsel



Dawn M. Odrowski

Attorney

Attachments:

1. Mark-up of IAFF Mailings Showing Republished Campaign Material and MFC Mailing
2. Factual and Legal Analysis of Indian Americans for Freedom and Shalabh Kumar
3. Factual and Legal Analysis of Manju for Congress and Manju Goel

MAILING #1 NEW 6790 5100 IN NEW 6783

Same postal permit number as MFC mailing "Presorted Standard US Postage PAID Permit 59 Rock Island, IL"



Revenue G Branch

Capitol

401

Where's Larry?

THE MISSING LINK



Facts Show...

Larry is temporarily here in Illinois..

Let's make sure that he stays that way!

Jan 3rd 2014, 3:48 pm in Illinois with Virginia License plates



Photo appears on MFC-created website "WhereisLarryWhoisLarry.com." Site is linked to on MFC campaign website.

We Deserve Better!!
Send Manju Goel to Congress from IL District 8!!

Where's Larry? Just passing through?

- Away from Illinois for more than 10 years?
- How many years in Hollywood?
- 6 months lease ending 3.31.2014?
- Violating Illinois residency law?



Photo
(cropped)
appears on
MFC website
home page.

Republican Manju Goel.
*Best Conservative Candidate to
Retire Tammy Duckworth from Congress*

Manju Goel will ...

- Champion Freedom and Limited Government
- Champion Personal Responsibility
- Champion Common-sense Household
Fiscal Discipline in Washington, DC
- Grow our Party, Bring 20K+ new voters
and Win Elections for a change!

Text and font is
identical to MFC
mailing

170444411

MAILING #2 NOV 6'03 ALSO IN NOV 6'03

FOR THE REPUBLICAN PARTY
ALSO IN NOV 6'03

William S. Anderson
1100 N. W. 11th St. #100
Miami, FL 33136

Republican Manju Goel.

In the words of Speaker Newt Gingrich, "I want to see Manju Goel in Congress"

- ★ Health care Efficiency Expert to untangle & end Obamacare.
- ★ Living embodiment of hard work and commitment to community & family.
- ★ Conservative Leader who will WIN US elections and advance our principles.

Photo appears on MFC website with Gingrich endorsement

Best Reagan Conservative for IL 8 to Retire Tammy Duckworth from Congress

Photo appears on MFC website.

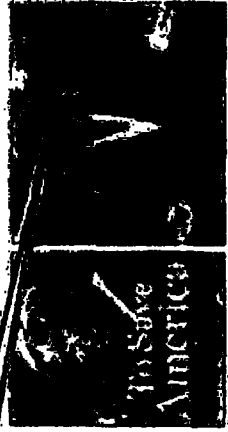
VOTE March 18

Same US Postal permit number as MFC mailing "Presorted Standard US Postage PAID Permit 59 Rock Island, IL"

Same font as MFC mailer

Flip of photo that appears on MFC website home page.

Photo appears on MFC website.



Newt Gingrich Endorsement of Manju Goel

Newt has endorsed only two candidates across the country in 2014 primaries

"As a skilled healthcare efficiency expert, Manju will bring exactly the kind of policy know-how to Congress that made us successful in the Nineties ~~and that we need now to untangle and end Obamacare.~~"

The full text of Gingrich endorsement appears on the "News" tab of MFC website. The same edits to that endorsement as shown, appear on later versions of the MFC website.



"In her life and career, Manju has been a testament to the value of hard work and of commitment to her community and family. She is poised to become a conservative leader in Illinois who will win us elections and advance our principles."

-Newt Gingrich

Photo appears on MFC Website.

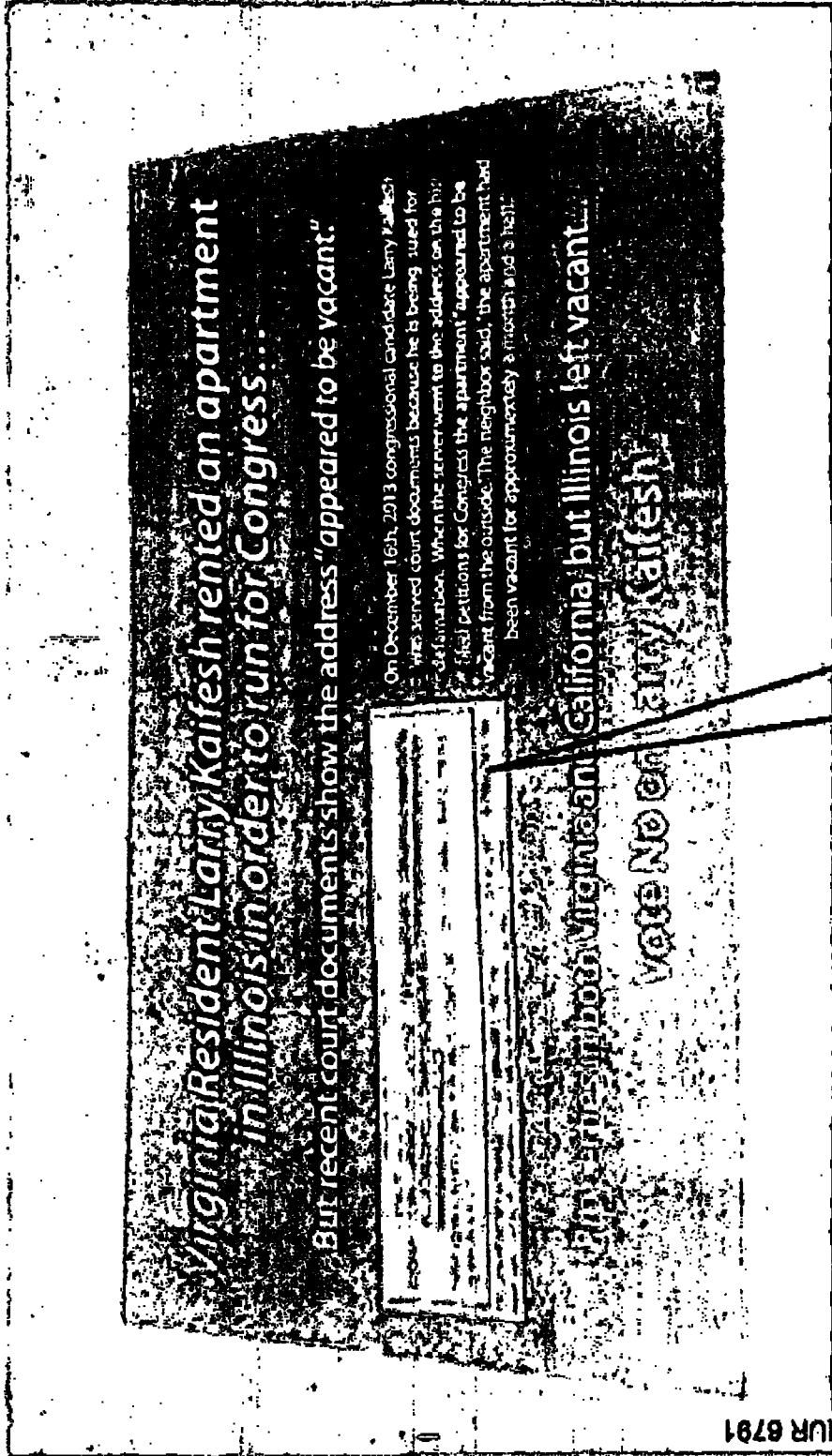
Reagan Conservative Manju Goel. Six Sigma, Green Belt HealthCare Efficiency Expert

- Living embodiment of Personal Responsibility and Fiscal Discipline
- Small Businesswoman who believes in Lower Taxes, Reduced Government Spending, Smaller and More Efficient Government, and Strong National Defence
- Manju will bring Common-Sense Solutions & Fiscal Discipline to Washington DC

Photo appears on MFC Website.

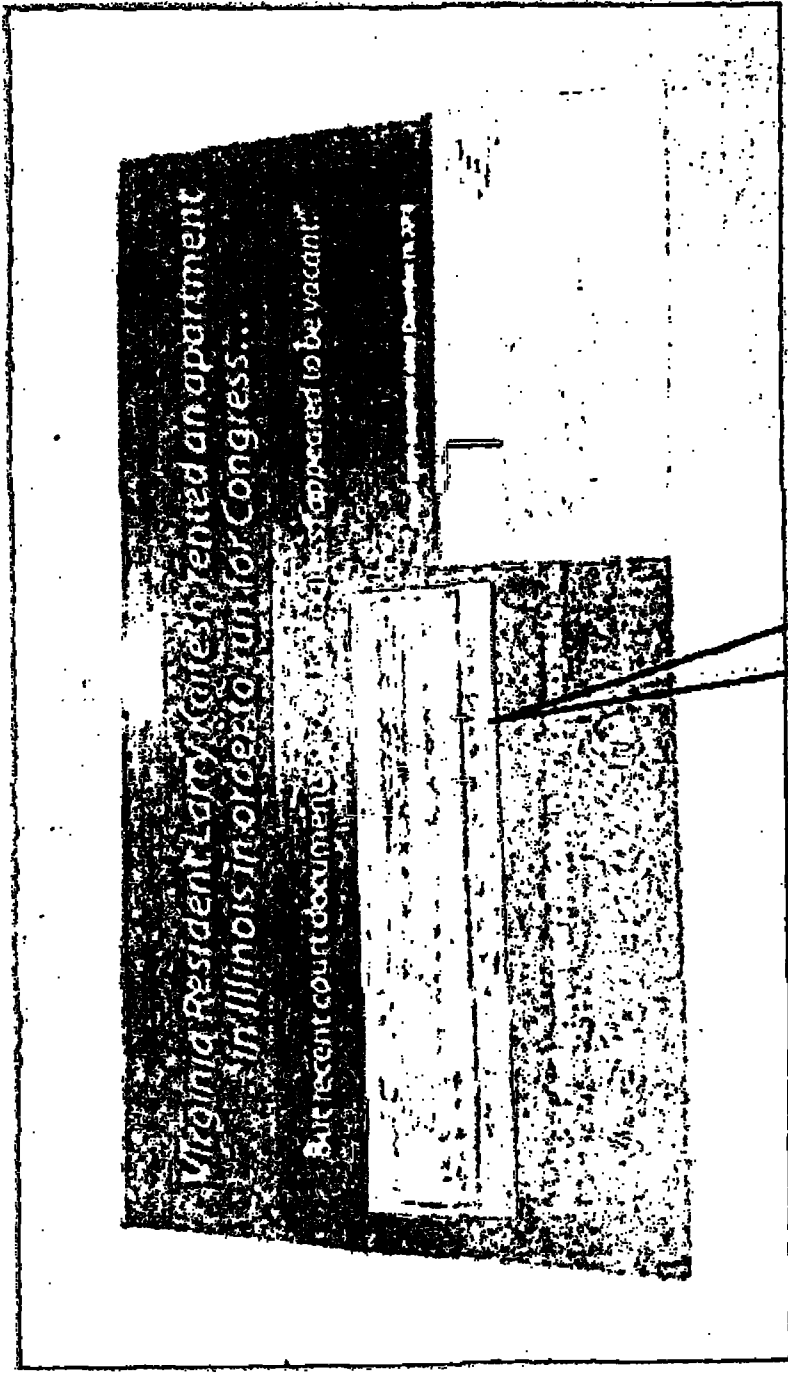
Manju will Grow our Party. Bring 20K+ new voters and Win Elections for a change !

Slogan appears on MFC Mailing



MAILING #5 MUR 6791

Excerpt of a process server affidavit that appears on the MFC website, "WhereIsLarryWhoIsLarry.com." Site is linked to on MFC website.



MAKING OF VOTER INFO ONLY

Indian Americans for Freedom
P.O. Box 84217 • Carol Stream, IL 60184
www.indianamericansforfreedom.org

William S. Anderson

Schedule: 11:00 AM - 12:00 PM

Wednesday, March 18, 2009

PAID
Postage
Permit No. 59
Rock Island, IL

Republican Manju Goel

In the words of Speaker Newt Gingrich, describing Manju

- ★ *Health care Efficiency Expert to untangle & end Obamacare.*
- ★ *Living embodiment of hard work and commitment to community & family.*
- ★ *Conservative Leader who will WIN US elections and advance our principles.*

"I want to see Manju Goel in Congress"

Speaker
Newt Gingrich

Best Reagan Conservative for IL 8
to Retire Tammy
worth from Congress

Also the P.O.
Box for MFC

Same US Postal
permit used for MFC
mailing.
"Presorted
Standard
US Postage
PAID
Permit 59
Rock Island, IL"

Same font as
MFC mailer

Flip photo that
appears on MFC
website home
page.

Photo appears on MFC website.

Photo on MFC
website with
Gingrich
endorsement

Here is what top national and local Republican leaders say about Manju Goel...



"As a skilled health care efficiency expert, Manju will bring exactly the kind of policy know-how to Congress that made us successful in the Nineties and that we need now to untangle and end Obamacare Congress". - Speaker Newt Gingrich



"Republican & conservative-leaning independents only account for 47% of IL 8. To win our candidate must have a substantive demographic base that is far deeper than the traditional GOP base. Our party need women of substance which is Manju". - Chairman Pete Sessions, two-term chairman of NRCC



"Manju is our best shot! She represents in the human form all of the ideal our party stands for: hardwork, faith, strong family & American exceptionalism". - Dy Whip Congressman Aaron Schock



"The Republican party will whither away and disintegrate if it welcomes & attracts minority candidates who believe in freedom & limited government. Manju represents that face". - Former Congressman Joe Walsh



"We rarely have a challenger a candidate who will resolutely stand up for conservative principles while also appealing beyond our party to bring us to victory. With Manju Goel we have that chance now". - Don Totten, Reagan's Man for middle America Midwest Campaign Manager 1980

Except from the 2-pg. Sessions endorsement letter on MFC website

Rock-Solid Reagan Conservative for IL 8, to Retire Tammy Duckworth

- Living embodiment of Personal Responsibility and Fiscal Discipline
- Small Businesswoman who believes in Lower Taxes, Reduced Government Spending, Smaller and More Efficient Government, and Strong National Defence
- Manju will bring Common-Sense Solutions & Fiscal Discipline to Washington DC

Manju will Grow our Party, Bring 20K+ new voters and Win Elections for a change!

VOTE

18

Tag line from MFC mailer.



Gingrich & Walsh endorsements & photos contain same text format and edits as on MFC website.

Photo (cropped) is on MFC website

Schock endorsement appears on MFC website as handwritten pg. Sessions endorsement letter in PDF form.

Except of Totten endorsement appearing in press release on MFC website.

MFC MAILING #1 - MUR 6783 ONLY



Republican Manju Goel.

Best Conservative Candidate to
Watch in the 2010 Congressional

Manju Goel will ...

- Champion Freedom and Limited Government
- Champion Personal Responsibility
- Champion Common-sense Household

Fiscal Discipline in Washington, DC
Only GOP Party Bring 204 New Voters



MANJU

Goel for Party
- Retake IL 9-

www.ManjuForCongress.com

Richard Crossley

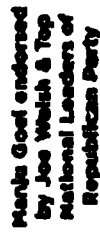
Villa Park, IL 60181-2510

1-800-444-4444

ATTACHMENT 1

Page 9

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As a first generation Indian American, Manju is uniquely qualified to broaden our base, grow our party and retake Illinois' 8th District, with almost twenty years of

www.ManipalorCongress.com 630-974-8252

- Ring penetration by an aromatic amine
- Mixture of two high polymers (phenol + DGEBA) as hardener
- Great improvement in DGEBA
- Used in epoxy resin formulations

[illegible]